

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATIONS OF
UNIVERSITY PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the DEPARTMENT OF
STATE, ET AL.,

Defendants.

No. 1:25-cv-10685-WGY

**NOTICE OF SEALED
SUBMISSION OF
DOCUMENTS FOR
IN CAMERA, EX PARTE
REVIEW**

**INDEX RELATING TO THE SEALED, *IN CAMERA, EX PARTE*
SUBMISSION OF DOCUMENTS**

Pursuant to the Court's invitation to submit documents for *in camera* inspection, the
Government respectfully submits the following:

Exhibit A. Report on Department of State Authorities to Counter Anti-Semitism
and Recommendations for Familiarizing Institutions of Higher Education with the Security
and Related Grounds for Visa Inadmissibility. This document is subject to the deliberative
process privilege and the presidential communications privilege and therefore has been
withheld from Plaintiffs in full.

Exhibits B-K are Department of Homeland Security documents that relate to specific
individuals. These documents are law enforcement sensitive and have not been filed in any
other proceedings or otherwise shared with the individuals discussed therein. They have
therefore been withheld from Plaintiffs in full.

Exhibit B. Letter to Andrea Toll Whiting, Director of Field Operations, U.S. State
Department on [REDACTED];

Exhibit C. HSI Report of Analysis on [REDACTED];

Exhibit D. Letter to Andrea Toll Whiting, Director of Field Operations, U.S. State Department on [REDACTED];

Exhibit E. HSI Report of Analysis on [REDACTED];

Exhibit F. Letter to John L. Armstrong, Senior Bureau Official Bureau of Consular Affairs, U.S. State Department on [REDACTED];

Exhibit G. HSI Report of Analysis on [REDACTED];

Exhibit H. Letter to John L. Armstrong, Senior Bureau Official Bureau of Consular Affairs, U.S. State Department on [REDACTED];

Exhibit I. HSI Report of Analysis on [REDACTED];

Exhibit J. Letter to John L. Armstrong, Senior Bureau Official Bureau of Consular Affairs, U.S. State Department on [REDACTED];

Exhibit K. HSI Report of Analysis on [REDACTED].

The following are Department of State documents that relate to specific individuals. These documents are subject to the deliberative process privilege and have not been filed in any other proceedings or otherwise shared with the individuals discussed therein. They have therefore been withheld from Plaintiffs in full.

Exhibit L. Action Memo for the Secretary -- Removal of [REDACTED] and [REDACTED] under INA 237(a)(4)(C);

Exhibit M. Action Memo for the Secretary -- Determination of Deportability of [REDACTED] under INA 237(a)(4)(C);

Exhibit N. Action Memo for the Secretary -- Determination of Deportability of [REDACTED] under INA 237(a)(4)(C);

Exhibit O. Action Memo for Senior Bureau Official John Armstrong -- [REDACTED]

Visa Revocation.

Respectfully Submitted,

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Dated: June 11, 2025